

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM GEORGETOWN COUNTY
Court of Common Pleas

Larry Hyman, Circuit Court Judge

Appellate Case No. 2019-001304

RECEIVED

OCT 04 2019

SC Court of Appeals

Phillippa Smalling, individually and as Next Friend for
Jahmerican M., a minor

Appellant,

v.

Lisa R. Maselli, M.D., both individually and
as agent/employee of Carolina OB-GYN,

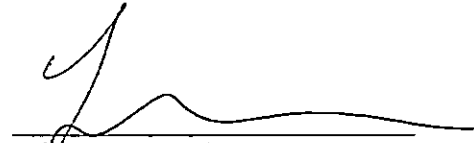
Respondents.

**MOTION FOR EXTENSION OF TIME TO
FILE INITIAL BRIEF**

COMES NOW, the Appellants, Phillippa Smalling, individually and as Next Friend of Jahmerican M., a minor, by and through their undersigned counsel, and hereby move the Court, pursuant to Rule 224, SCACR, for a 30-day extension of time to file the Initial Brief of Appellants in this action. The current deadline is October 7, 2019. With the requested extension, the new deadline would be November 6, 2019.

Appellant's counsel needs more time to complete the brief because the appeal involves novel issues which require more than usual preparation time; and appellant's counsel has been unable to complete the brief because of other professional responsibilities including court proceedings and deadlines in other cases. Counsel for Appellant has contacted counsel for Respondents who has not indicated whether or not he consent to the extension.

WHEREFORE, Appellant respectfully requests until **November 6, 2019** in which to file the Initial Brief in this action.



Edward L. Graham
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Attorneys for Appellant

October 4, 2019

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PROOF OF SERVICE

I certify that I have served the Motion for Extension of Time to file Initial Brief on Lisa R. Maselli, M.D., both individually and as agent/employee of Carolina OB-GYN by electronic mail and by depositing a copy of it in the United States Mail, postage prepaid, on October 4, 2019, addressed to their attorneys of record, Other Counsel of Record: James B. Hood and John O. Radeck, Jr., HOOD LAW FIRM, LLC, Post Office Box 1508, Charleston, SC 29402



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Attorneys for Appellant

October 4, 2019



GRAHAM LAW

Shining a Light on Safety, Guiding the Way to Justice.

Edward L. Graham, Esq.

October 4, 2019

VIA HAND DELIVERY

Clerk of Court
1220 Senate Street
Columbia, South Carolina 29201

RECEIVED

OCT 04 2019

SC Court of Appeals

RE: Notice of Appeal
Case No. 2016-CP-2200863
Appeal from Georgetown County

Dear Clerk,

I have enclosed the following for docketing:

1. Motion for Extension of Time
2. Certificate of Mailing
3. Filing fee of \$50.00

Please clock a copy of the Notice and return it to me in the enclosed envelope.

Sincerely,

Edward L. Graham, Esq.
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